

EXHIBIT 2

Harrison's Objections to DEFENDANTS' TRIAL EXHIBIT LIST

Harrison Company, L.L.C. v. A-Z Wholesalers, Inc. and Barkat G. Ali

Civil Action No. 3:19-cv-1057-B

In the United States District Court, Northern District of Texas, Dallas Division

EXHIBIT NO.	DOCUMENT BEGINNING DATE	GENERAL DESCRIPTION	REFERENCE		HARRISON'S OBJECTIONS	RULING		ADMIT WITH LIMIT
			BEGINNING NUMBER	ENDING NUMBER		OFF	ADMIT	
D-1	10/22/18	Statement – Imperial Trading Co.	AZ9765	AZ9767				
D-2	10/22/18	Statement – Imperial Trading Co	AZ9769	AZ9770				
D-3	10/26/18	Statement – Imperial Trading Co	AZ9772	AZ9774	403 – Needlessly cumulative			
D-4	10/26/18	Statement – Imperial Trading Co	AZ9776	AZ9777	403 – Needlessly cumulative			
D-5	11/2/18	Statement – Imperial Trading Co	AZ9786	AZ9787	403 – Needlessly cumulative			
D-6	11/2/18	Statement – Imperial Trading Co	AZ9789	AZ9789	403 – Needlessly cumulative			
D-7	11/9/18	Statement – Imperial Trading Co	AZ9793	AZ9794	403 – Needlessly cumulative			
D-8	11/9/18	Statement – Imperial Trading Co	AZ9796	AZ9796	403 – Needlessly cumulative			
D-9	11/16/18	Statement – Imperial Trading Co	AZ9802	AZ9804	403 – Needlessly cumulative			
D-12	11/23/18	Statement – Imperial Trading Co	AZ9818	AZ9819	403 – Needlessly cumulative			
D-13	11/30/18	Statement – Imperial Trading Co	AZ9832	AZ9833	403 – Needlessly cumulative			
D-14	11/30/18	Statement – Imperial Trading Co	AZ9835	AZ9835	403 – Needlessly cumulative			
D-15	12/7/18	Statement – Imperial Trading Co	AZ9859	AZ9860	403 – Needlessly cumulative			
D-16	12/7/18	Statement – Imperial Trading Co	AZ9862	AZ9862	403 – Needlessly cumulative			
D-17	12/14/18	Statement – Imperial Trading Co	AZ9866	AZ9867	403 – Needlessly cumulative			
D-18	12/14/18	Statement – Imperial Trading Co	AZ9869	AZ9869	403 – Needlessly cumulative			
D-19	12/21/18	Statement – Imperial Trading Co	AZ9876	AZ9878	403 – Needlessly cumulative			
D-20	12/21/18	Statement – Imperial Trading Co	AZ9880	AZ9880	403 – Needlessly cumulative			
D-21	12/28/18	Statement – Imperial Trading Co	AZ9890	AZ9892	403 – Needlessly cumulative			
D-22	12/28/18	Statement – Imperial Trading Co	AZ9894	AZ9894	403 – Needlessly cumulative			
D-23	1/4/19	Statement – Imperial Trading Co	AZ9900	AZ9901	403 – Needlessly cumulative			
D-24	1/4/19	Statement – Imperial Trading Co	AZ9903	AZ9903	403 – Needlessly cumulative			
D-25	1/11/19	Statement – Imperial Trading Co	AZ9907	AZ9908	403 – Needlessly cumulative			
D-26	1/11/19	Statement – Imperial Trading Co	AZ9910	AZ9910	403 – Needlessly cumulative			
D-27	1/18/19	Statement – Imperial Trading Co	AZ9926	AZ9927	403 – Needlessly cumulative			
D-28	1/18/19	Statement – Imperial Trading Co	AZ9929	AZ9930	403 – Needlessly cumulative			
D-29	1/25/19	Statement – Imperial Trading Co	AZ9934	AZ9936	403 – Needlessly cumulative			
D-30	1/25/19	Statement – Imperial Trading Co	AZ9938	AZ9939	403 – Needlessly cumulative			
D-31	2/1/19	Statement – Imperial Trading Co	AZ9951	AZ9952	403 – Needlessly cumulative			
D-32	2/1/19	Statement – Imperial Trading Co	AZ9954	AZ9954	403 – Needlessly cumulative			
D-33	2/8/19	Cashier's Check payable from A-Z to Imperial Trading Co	AZ9958	AZ9958	401/402 – Relevance			
D-34	2/8/19	Statement – Imperial Trading Co	AZ9961-	AZ9962	403 – Needlessly cumulative			
D-35	2/8/19	Statement – Imperial Trading Co	AZ9964	AZ9964	403 – Needlessly cumulative			
D-36	2/15/19	Statement – Imperial Trading Co	AZ9974	AZ9975	403 – Needlessly cumulative			
D-37	2/15/19	Statement – Imperial Trading Co	AZ9977	AZ9977	403 – Needlessly cumulative			
D-38	2/22/19	Statement – Imperial Trading Co	AZ9984	AZ9986	403 – Needlessly cumulative			
D-39	2/22/19	Statement – Imperial Trading Co	AZ9988	AZ9989	403 – Needlessly cumulative			
D-40	3/1/19	Statement – Imperial Trading Co	AZ9997	AZ9997	403 – Needlessly cumulative			

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D-41		3/1/19	Statement – Imperial Trading Co	AZ9999 AZ10366, 10371, 10373-10374, 10381- 10382, 10387-10388, 10390, 10395, 10464-10465, 10468- 10469, 10531, 10734-10735, 10765- 10767, 10797-	AZ9999	401/402 – Relevance Improper compilation / optional completeness 408 – Offers of settlement 801 – Hearsay			
D-42			SMS Messages from Imperial Employees		AZ 10798				
			Plaintiff's Verified Original Petition and Emergency Application for Ex Parte Appointment of Receiver (DC-19-04222 filed in the 101st Judicial District Court, Dallas County, Texas	A-Z-1	A-Z-14	401/402 – Relevance (court struck estoppel defense); 403 – Unfairly prejudicial / confusing			
D-43			Motion for Non-Suit Without Prejudice (DC-19- 04222)	A-Z-15	A-Z-16	401/402 – Relevance (court struck estoppel defense); 403 – Unfairly prejudicial / confusing			
D-44			Order Granting Non-Suit Without Prejudice (DC- 19-04222)	A-Z-17	A-Z-17	401/402 – Relevance (court struck estoppel defense); 403 – Unfairly prejudicial			
D-45			Prendegast Verification of Original Petition (DC- 19-04222)	A-Z-18 A-Z 19	A-Z-18 A-Z 23	401/402 – Relevance (court struck estoppel defense); 403 – Unfairly prejudicial / confusing			
D-46		3/11/11	Harrison Co. Credit Application						
D-47		1/11/19	Promissory Note and Commercial Guaranty	A-Z 24	A-Z 28	401/402 – Relevance 408 – Offers of settlement 801 – Hearsay			
D-48			Notice of Default and Demand for Payment to Imperial Trading Co, LLC			401/402 – Relevance; 403 – Unfairly prejudicial 408 – Offers of settlement 801 – Hearsay			
D-49		3/18/2019	Imperial Trading Company Invoice various numbers	A-Z 30 A-Z 33	A-Z 32 A-Z 182	401/402 – Relevance 403 – Needlessly cumulative			
D-50		10/22/18 – 3/4/19	Statement – Imperial Trading Co	A-Z 183	A-Z 184	401/402 – Relevance 403 – Confusing			
D-51		6/12/20	Plaintiff's Original Complaint (Cause No. 3:19-cv- 01057-B) filed in United States District Court for the Northern District of Texas	AZ 185	AZ 189	401/402 – Relevance; 403 – Unfairly prejudicial 602 – lack of personal knowledge; speculation 701 – Improper conclusions			
D-52			Defendants' First Amended Answer to Plaintiff's Original Complaint. (Cause No. 3:19-cv01057-B)						
D-53				A-Z 190	A-Z 197				

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			BEGINNING NUMBER	ENDING NUMBER		OFF	ADMIT	
D-54		Declaration of Amar B. Ali (Cause No. 3:19-cv-01057-B)	A-Z 198	A-Z 202	602 – Lack of personal knowledge; speculation 701 – Improper conclusions 801 – Hearsay			
D-55		Declaration of Barkat G. Ali (Cause No. 3:19-cv-01057-B)	A-Z 203	A-Z 207	602 – Lack of personal knowledge; speculation 701 – Improper conclusions 801 – Hearsay			
D-56	2/11/15	Statement – Harrison Co., LLC	A-Z 208	A-Z 228	401/402 – Relevance			
D-57	10/29/18	Imperial Trading Co. Shipping Manifest 418036 dtd Imperial Trading Co., LLC UCC-1 (18-0002135898)	AZ 229 HAR000689	AZ 267 HAR000727	403 – Needlessly cumulative Improper compilation (403, 901) – document is comprised of materials that are improperly compiled 401/402 – Relevance			
D-58	1/19/18		AZ 268	AZ 268	401/402 – Relevance 403 – Confusing			
D-59	8/10/18	Imperial Trading Co., LLC UCC-1 Amendment (18-00282094) Terminating UCC-1 (18-0002135898)	A-Z 269	A-Z 269	401/402 – Relevance 403 – Confusing			
D-60	4/17/19	Harrison Co., LLC UCC-1 (19-0014045014)	A-Z 273	A-Z 273	401/402 – Relevance 403 – Confusing			
D-61	3/24/20	Harrison Co., LLC UCC-1 Amendment (20-00113694) Terminating UCC-1 (19-0014045014)	A-Z 275	A-Z 275	401/402 – Relevance 403 – Confusing			
D-62		Declaration of Amar B. Ali (Cause No. 3:19-cv-01057-B)	A-Z 276	A-Z 277	602 – Lack of personal knowledge; speculation 701 – Improper conclusions 801 – Hearsay			
D-63	1/27/21	Deposition of Amar B. Ali Order Granting Motion to Dissolve Receivership and Overturning on Appeal the Associate Judge's Order Appointing Receiver (Cause No. DC-19-04222)	A-Z 278	A-Z 400	801 – Hearsay 401/402 – Relevance (court struck estoppel defense); 403 – Unfairly prejudicial			
D-64			A-Z 401	A-Z 401	401/402 – Relevance 403 – Confusing			
D-65		Plaintiff's Initial Disclosures	A-Z 402	A-Z 404	401/402 – Relevance 403 – Confusing			

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EXHIBIT NO.	BEGINNING DATE	BEGINNING NUMBER	ENDING NUMBER		OFF	ADMIT
						ADMIT WITH LIMIT
D-66		Plaintiff's Objections and Responses to Defendants' First Amended Set of Discovery Requests	A-Z 405	A-Z 414	Harrison offers to stipulate to anything Harrison admitted and to any interrogatory answer; however, the balance of the document is irrelevant (401/402), prejudicial and/or confusing (403), and hearsay (801)	
D-67		Plaintiff's Objections and Responses to Defendants' Second Set of Discovery Requests	A-Z 415	A-Z 420	Harrison offers to stipulate to anything Harrison admitted and to any interrogatory answer; however, the balance of the document is irrelevant (401/402), prejudicial and/or confusing (403), and hearsay (801)	
D-68		Emails originating at Imperial Trading Co. Bossier City Distribution Center	A-Z 3765	A-Z 3773	401/402 – Relevance Improper compilation (403, 901) – document is comprised of materials that are improperly compiled	